MISCELLANEOUS REGULATIONS

VERSION 8

EFFECTIVE: January 1, 2018

Internal Audit	Compliance	Checklist
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Auditor's Name and Date	

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Review Period:	
rnal auditor to use guidelines, checklists an in compliance with applicable statutes, reg satisfies these requirements.	d other "criteria established by the chairman" gulations, and Minimum Internal Control
Person Interviewed	Position
	nal auditor to use guidelines, checklists an in compliance with applicable statutes, reg satisfies these requirements.

Checklist Completion Notes:

- 1) Unless otherwise instructed, examine a completed document for compliance for those questions referring to records/documentation as indicated and recalculate where appropriate. Indicate (by tickmark) whether the procedures were confirmed via examination/review of documentation, through inquiry of personnel or via observation of procedures. Tickmarks used are to be defined at the bottom of each page.
- 2) All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless the Board Chairman has granted a Regulation waiver or the question requires a "no" answer for acceptability. All "N/A" answers require referencing and/or comment, as to the reason the procedure is not applicable. All exceptions noted should be carried to the internal auditor's report/summary of findings for timely follow-up.

Scope:

This checklist must be completed once in each fiscal year.

Regulation Waivers:

Obtain copies of regulation waiver requests and GCB correspondence regarding such requests from appropriate property personnel. Review to determine status of evidence of any waivers or alternative requirements imposed by granted waivers. Modify and/or perform additional procedures as applicable.

Date Approval Granted	Regulation	Description of Waiver Granted	Number(s) of Procedure Modified or Added	W/P Ref. (if appl.)

Note: Waivers need only be scheduled once. Refer to the workpaper where the details are scheduled and complete the last two columns of the above grid if walk-through procedures are affected.

Verified per representation
Verified per observation/examination

VERSION 8

EFFECTIVE: January 1, 2018

Internal Aud	lit Compliance	Checklist
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Auditor's Name and Date	
_	1

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Licensee: Review Period:

	Questions	Yes	No	N/A	Comments, W/P Reference
Regulation 5.1	05				
indicating provided v security no any emplo	ntation maintained that the Board was with the name, social amber and date of birth of yee being granted access rd's system of records? In 5.105(3)				
indicating notified up employme the reassig mentioned position th employee	ntation maintained that the Board was on the termination of nt of such employee or nment of such employee in the previous step to a at no longer requires the to access the Board's records? Regulation				
#1 or the li informatio Board's sy confidentia	employee mentioned in censee know that the n contained within the stem of records is all and must not be Regulation 5.105(3)				
Regulation 5.1	15 Periodic payments				
won this y (annuity, le etc.) which periodic pa contracts b Chairman Board or th	ic payments that were ear, obtain the contracts etter of credit, trust fund, a guarantee funding of the ayments. Have these een approved by the of the Gaming Control ne Nevada Gaming on, as appropriate?				

Verified per representation Verified per observation/examination

Internal Audit	Compliance	Checklist
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Auditor's Name and Date

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Review Period:

	Questions	Yes	No	N/A	Comments, W/P Reference
5.	Are periodic payments offered only for potential payouts which exceed \$100,000? Regulation 5.115(5)				
6.	Are signs displayed on gaming devices or in each gaming/tournament/promotional area, as appropriate, indicating the amount or terms of the periodic payments? Regulation 5.115(7)				
7.	Regarding any game, etc. where winnings are to be made via periodic payments, does all associated radio, television, other electronic media or print advertising indicate periodic payments are to be made? Regulation 5.115(7)				
8.	When the reserve method is used for funding periodic payments, are the conditions prescribed by the chairman met? Regulation 5.115(3)(c)				

Verified per representation Verified per observation/examination

Licensee:

Internal Aud	lit Compliance	Checklist
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Auditor's Name and Date

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Review Period:

Questions	Yes	No	N/A	Comments, W/P Reference
9. For patrons that were offered a qualified prize option, was the option provided in writing to the patron within five days after the conclusion of the validation period?				
Did the offer explain:				
a. The method used to compute the single cash payment?				
b. The discount rate as of the date of calculation?				
c. State that the patron is under no obligation to accept the offer of a single cash payment and may nevertheless elect to receive periodic payments for the qualified prize? Regulation 5.115(8)				
10. Does the licensee maintain the amounts, as applicable, related to each gaming or promotional activity that uses periodic payments in calculating its minimum bankroll requirement for the purpose of complying with Regulation 6.150? Regulation 5.115(9)				
11. At least annually, does the licensee verify that the independent financial institution and brokerage firm being used to guarantee or remit periodic payments to patrons or to hold approved funding sources related thereto continues to meet the applicable qualifications required by Regulation 5.115(2)? Regulation 5.115(11)				

Verified per representation Verified per observation/examination

Licensee:

Internal Audit	Compliance	Checklist
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Auditor's Name and Date

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Licensee:			Review 1	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
12. In the event that the licensee determined that such entities no longer meet the defined requirements, did the licensee immediately notify the chairman of the change in status and within 30 days provided a written plan to comply with these requirements? Regulation 5.115(11)				
Regulation 5.170 Programs to address problem gambling				
13. Has the licensee posted in conspicuous places in or near gaming areas, cage areas and cash dispensing machines located in gaming areas materials concerning the nature and symptoms of problem gambling and the toll-free telephone number of the National Council on Problem Gambling or a similar entity approved by the chairman of the Board that provides information and referral services for problem gamblers? Regulation 5.170(2)				
Note: This regulation does not apply to kiosks which only breaks bills and redeems wagering instruments.				
14. Has a training program been implemented for all employees who interact with patrons in gaming areas addressing problem gaming helperior? Pagulation 5 170(2)				

Verified per representation Verified per observation/examination

Internal Audit	Compliance	Checklist
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Auditor's Name and Date

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Licensee:			Review 1	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
15. Have personnel been designated as responsible for maintaining the program and addressing the types and frequency of training and procedures? Regulation 5.170(3) Indicate the title(s) of personnel involved.				
16. If the licensee issues credit, cashes checks or distributes promotional materials for gaming opportunities, has a program been established whereby patrons may self-limit their access to gaming? Regulation 5.170(4)				
17. Does the program include, as				
appropriate, the following elements: a) The development of written materials for dissemination to patrons explaining the program? Regulation 5.170(4)				
b) The development of written forms allowing patrons to participate in the program? Regulation 5.170(4)				
c) Standards and procedures that allow a patron to be prohibited from access to check cashing, the issuance of credit, and the participation in promotional activities? Regulation 5.170(4)				

Verified per representation Verified per observation/examination

Internal Audit	Compliance	Checklist
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Auditor's Name and Date

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Review Period:

Questions	Yes	No	N/A	Comments, W/P Reference
d) Standards and procedures that allow a patron to be removed from the licensee's direct mailing and other direct marketing regarding gaming opportunities at that licensee's location? Regulation 5.170(4)				
e) Procedures and forms requiring the patron to notify a designated office of the licensee within 10 days of the patron's receipt of any financial gaming privilege, material or promotion covered by the program? Regulation 5.170(4)				
18. Select one gaming employee (such as a dealer or a cage cashier) and pose the following question: "If a patron were to tell you that he needed help in controlling his or her gambling, what resources would you direct him or her to?" Was the employee knowledgeable about the programs established at that property? Regulation 5.170(3) Indicate any remarks of significance made by the employee interviewed.				
Gaming Salon 19. When a gaming salon is being operated, perform the necessary procedures to determine whether the gaming salon operation is in compliance with Regulation 5.200(3)				

Verified per representation Verified per observation/examination

Licensee:

Internal Audit	Compliance	Checklist
-----------------------	------------	-----------

Auditor's Name and Date

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Licensee:			Review Period:			
Questions	Yes	No	N/A	Comments, W/P Reference		
Drawings 20. Observe a minimum of one drawing in any gaming area during the fiscal year to determine whether the drawing was conducted in accordance with conditions provided to the patrons. Regulation 6.090(13) Note: Refer to the Minimum Internal Control Standard of the applicable section addressing promotional drawings (e.g., Table Games MICS #132 - 134 and #167).	763					
Regulation 5.210 Imposition of admission fee to gaming area 21. Has prior written administrative approval from the Chairman been received for, directly or indirectly, restricting access to any portion of an establishment wherein gaming is conducted, through the assessment or imposition of a fee? Regulation 5.210(2)						
5.215 Operation of a system supported or system based gaming device 22. Has a list of the current persons who may access the main computer or data communications components of its system been provided to the						

Verified per representation Verified per observation/examination

Board? Regulation 5.215(2)(a)

Internal Audit	Compliance	Checklist
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Auditor's Name and Date	

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Review Period:

Questions	Yes	No	N/A	Comments, W/P Reference
Regulation 5.220 Operation of a mobile gaming system 23. Has the Board approved the area the system is exposed for play to the public? Regulation 5.220(2)				
Regulation 5.235 Hosting center; requirements on licensees utilizing hosting centers; limitations on operations at hosting centers				
24. If parts of any game, gaming device, cashless wagering system, or race/sports book are operated at a hosting center, does the hosting center have an active registration with the Board pursuant to Regulation 5.230? Regulation 5.235(1)				
25. Has the Board been notified in writing of any hosting centers being used, along with a description of what operations will take place at the hosting center? Regulation 5.235(2) Indicate the hosting center(s) being utilized.				
26. Has the Board been notified in writing of any changes, if any, to the operations at the hosting center? Regulation 5.235(2)				
27. Has the Board been notified in writing of a cessation of all operations, if applicable, at the hosting center? Regulation 5.235(2)				

Verified per representation Verified per observation/examination

Licensee:

Internal Audit	Compliance	Checklist
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Auditor's Name and Date	
	1

MISCELLANEOUS REGULATIONS WALK-THROUGH PROCEDURES

Licensee:			Review 1	Period:
Questions	Yes	No	N/A	Comments, W/P Reference
28. For operations taking place at the hosting center, is the physical acceptance of a wager from a patron or payout of winnings to a patron prohibited to occur at the hosting center? Regulation 5.235(3)				
5.240 Service Providers 29. If a service provider is being used, has the service provider obtained the appropriate license from the Commission to provide such services? Regulation 5.240(4)				
Procedures Modified or Added:				

Verified per representation Verified per observation/examination

Auditor's Name and Date	
	1

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:	Review Period:	

NGC Regulation 6.090(15) requires the internal auditor to use guidelines, checklists and other "criteria established by the chairman" in determining whether a Group I licensee is in compliance with applicable statutes, regulations, and Minimum Internal Control Standards (MICS). The use of this checklist satisfies these requirements.

Preparation:

Obtain the most recent Board issued "List of Denials and Findings of Unsuitability" available on the Board's website. Be cognizant of these individuals in the performance of the various testing procedures. Agreements or contracts with these individuals are prohibited pursuant to **NRS 463.165**, unless prior Nevada Gaming Commission approval was received.

Checklist Completion Notes:

- 1) Unless otherwise instructed, examine a completed document of the licensee for compliance for those questions referring to records/documentation as indicated and recalculate where appropriate. Only those documents of the operating licensee need be examined/reviewed. Indicate (by tickmark) whether the procedures were confirmed via examination/review of documentation, through inquiry of personnel or via observation of procedures. Tickmarks used are to be defined at the bottom of each page.
- 2) All "no" answers require referencing and/or comment, and should be cited as regulation violations, unless the Board Chairman has granted a regulation waiver or the question requires a "no" answer for acceptability. All exceptions noted should be carried to the internal auditor's report/summary of findings for timely follow-up.

Scope:

See individual procedures.

Procedures	Step completed without exception	Exception/Comment
Review prior internal audit reports. Schedule any relevant exceptions cited including those cited by the GCB or the CPA, or include a copy of the prior audireports in the workpapers and follow up on any problems noted. Duplication of exceptions when the CPA is referring to	it	
exceptions reported in internal audit reports is not necessary.		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 1 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:		Review Period:
	Step completed	

Procedures	Step completed without exception	Exception/Comment
Regulation 3.100 Employee Report	•	
2. Obtain the most recently filed copy of the Regulation 3.100 Employee Report and the applicable files for the filing of this report:		
 a) From review of correspondence files, reports (relating to gaming credit policy and complimentary benefits), payroll registers, disbursement journals, minutes and observations of employee activities, determine if management employees fall under any of the categories to qualify as reportable employees and are included on the Employee Report. Scope: Trace the names of 3 reportable employees from each of the records specified above to the Employee Report. 		
b) For a sample of ten employees, listed on the Employee Report, verify that all disclosed information is complete (e.g., name, position title, last four digits of social security number and a complete list of those categories which apply to each employee).		
c) Determine that the Employee Report was properly submitted to the Board in a timely manner (within 30 days after March 31 st and within 30 days after September 30th).		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 2 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee: Review Period:

Procedures	Step completed without exception	Exception/Comment
d) For corporations, determine that all officers and directors have been properly licensed or have filed for licensure pursuant to NRS 463.530 and NRS 463.540.		
e) For limited-liability companies, determine that all members have been licensed or have filed for licensure pursuant to NRS 463.5735.		
f) For partnerships, determine that all partners have been licensed or have filed for licensure pursuant to NRS 463.569.		
Regulation 5.013 Gaming by, and Issuance of Gaming Credit to, Owners, Directors, Officers, and Employees		
3. Obtain the current customer deposit, wagering accounts and casino accounts receivable listings. Also obtain the Employee Report most recently submitted to the Board. Review the customer deposit, wagering accounts and casino accounts receivable listings for names of officers, directors, and owners and a sample of 10% or 10 key employees from the key employee report, whichever amount is greater. Any casino account receivable or customer deposit, wagering account for such individuals are reviewed to ensure that no play or placement of a wager occurred pursuant to Regulation 5.013(1) and for the propriety of the		

✓ - Step completed without exception

transaction.

EFFECTIVE: January 1, 2018 Page 3 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:	Review Period:	
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	Procedures	Step completed without exception	Exception/Comment
4.	Obtain a list of the current cage department employees from the Human Resources Department and select a sample of 10% or 10 cage department employees, whichever amount is higher. Review the listings obtained in the previous step for the sample of cage department employees selected. Any casino accounts receivable, wagering account or customer deposit for such individuals are reviewed for the propriety of the transaction. (Asset Protection)		
5.	For one day, review the player tracking records, W2-G's, multiple transaction logs and book wagering reports for gaming winnings paid to officers, directors, owners and key employees. Regulation 5.013		
6.	For one day, review disbursements made by the cage department to officers, directors, owners and key employees for gaming winnings. Regulation 5.013		

EFFECTIVE: January 1, 2018 Page 4 of 15

Auditor's Name and Date	

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:	Review Period:	

Procedures	Step completed without exception	Exception/Comment
Regulation 5.105 Duties of Licensee		
7. For five individuals on the current system of records, determine that an application for employment was received prior to accessing the GCB system of records. Regulation 5.105(2)		
Indicate the names of the five individuals reviewed and the date the employment application was received.		
Note: A record of the date the application is received is adequate documentation in supporting that an application for employment was received prior to accessing the GCB system of records. The date the GCB system of records is actually accessed is not required to be documented.		
8. Review the most recent monthly report of hired employees submitted to the Board to determine that it contains the proper information and that it was submitted by the specified day pursuant to Regulation 5.105(11).		
9. For the most recent calendar quarter determine the following:		
a) That the proper information for each terminated employee was either entered into the Board's online gaming employee registration system or included on a written report submitted to the Board by the specified day pursuant to Regulation 5.105(12).		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 5 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:		Review Period:	
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	Step		

	G.	
	Step completed	
Procedures	without	Exception/Comment
	exception	
b) For those persons required to		
register pursuant to Regulation		
5.320, does such entry or written		
report include a truthful statement of the reason(s) for each termination		
and resignation and any additional		
information regarding the		
termination or resignation as may be		
requested by the chairman?		
Regulation 5.105(12)		
10. Review the human resources files and		
select five gaming employees currently		
employed and five terminated		
employees to determine whether a photo		
of the gaming employee is being maintained. Regulation 5.105(13)		
mamamed. Regulation 3.105(13)		
Indicate the names of the gaming		
employees selected and status of		
employment.		
11. Do the photos of the gaming employees		
reviewed in the previous step meet the		
requirements of Regulation 5.105(13)?		
Regulation 5.160 Surveillance System		
12. Obtain a copy of the current surveillance		
system plan and determine that the plan		
and any amendments to the plan:		
a) Have been submitted to the Board.		
Verify by reviewing approval communication from the Board's		
Enforcement Division or by		
contacting the Board's Enforcement		
Division.		
b) Determine that procedures are in		
effect to fulfill the requirements of		
the plan. Verify by observation		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 6 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee: Review Period:

Procedures	Step completed without exception	Exception/Comment
Regulations 6.040 and 6.060 Accounting		
Records and Retention		
 13. For all records of all transactions pertaining to revenue that is taxable or subject to fees under chapters 463 and 464 of the NRS and for all records required to be maintained by Regulation 6: a) Review procedures for document storage, retrieval, return and destruction. 		
b) Perform an observation of storage facilities to determine adequacy of controls.		
c) If computerized or microfiche storage, determine that files are		

✓ - Step completed without exception

properly indexed by casino department and date.

Regulation 6.050 Records of Ownership

14. Determine the location and availability of the corporate, partnership or sole proprietorship (as applicable) records of ownership identified in **Regulation**

6.050.

EFFECTIVE: January 1, 2018 Page 7 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:	Review Period:	
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Procedures	Step completed without exception	Exception/Comment
Regulation 6.110(2) Hopper Adjustments		
15. Obtain the supporting documentation for any adjustment to slot drop for the difference between the initial hopper loads and the total amount in the hoppers at fiscal year end. If a slot hopper test was performed but no adjustment to reported slot revenue was made, determine the reason for not making an adjustment and perform steps #15a-c. If no slot hopper test was performed, cite a violation of Regulation 6.110(2).		
a) Determine that the general ledger hopper account balance is reasonable.		
b) Foot hopper test results and recalculate estimated hopper totals, comparing to general ledger account balance.		
c) Determine that the amount of the adjustment is proper.		
Regulation 6.150 Minimum Bankroll		
16. Verify compliance with Regulation 6.150 by calculating available bankroll and comparing this figure to the minimum bankroll requirements; and comparing the results to the monthly computations of bankroll requirements and actual bankroll available required pursuant to Regulation 6.150.		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 8 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee: Review Period:

Procedures	Step completed without exception	Exception/Comment
Regulation 8.130 Transaction Reports	•	
 17. Review the following documents for transactions which may be reportable pursuant to Regulation 8.130. For those items determined to be reportable, trace to filings. Unless otherwise specified, documents generated during the fiscal year should be reviewed. a) Review loan, lease and contract agreements. Note: In conjunction with this review, be on the alert for finder's fees. Payment of finder's fees requires prior Nevada Gaming Commission approval pursuant to Regulation 5.120. 		
Scope: Review all <u>new</u> loan, lease and contract agreements executed since the last review of these files.		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 9 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee: Review Period:

Procedures	Step completed without exception	Exception/Comment
 b) Review transactions greater than \$30,000 in the disbursements journal for a minimum of two months during the fiscal year. Transactions which may be reportable pursuant to Regulation 8.130 include: 1) Leases and capital leases. 2) Installment purchase contracts. 3) Loans, mortgages and trust deeds. 4) Accounts payable and accrued expenses due to unaffiliated persons where the payment terms or actual length of payments exceed 12 months. 		

Note: For disbursements which involve dividend payments to owners or distributions to non-owners/key employees, determine compliance with

NRS 463.160(1)(d).

EFFECTIVE: January 1, 2018 Page 10 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee: Review Period:

Procedures	Step completed without exception	Exception/Comment
c) Review records of receipt such as the cash receipts journal and cage accountability documents for a minimum of two months during the fiscal year. Transactions which may be reportable pursuant to Regulation 8.130 include: 1) Tenant deposits. 2) Capital contributions and loans by a person who is a stockholder, partner or proprietor of the company. Note: Be aware of payments by bonding companies for losses as a result of employee embezzlement or fraud, or payments from employees making restitution for cases of theft, fraud or embezzlement. For any entries related to embezzlements, review the associated security reports and ensure that the incidents were properly reported to the Board and any recovered monies were included in gross gaming revenue, if appropriate.		
d) Review safekeeping deposits for a minimum of one month during the fiscal year. Deposits which may be reportable pursuant to Regulation 8.130 are those made by an individual owning, directly or indirectly, 10% interest in the company; commingled with company funds; left for more than 10 days; and aggregate to an amount greater than 25% of cash in the cage.		

 \checkmark - Step completed without exception

EFFECTIVE: January 1, 2018 Page 11 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:		Review Period:
Procedures	Step completed without exception	Exception/Comment
e) Review asset and liability account Transactions which may be reportable pursuant to Regulation 8.130 include: 1) Property donated. 2) Conversions of accounts payable, accrued expenses or other liabilities to notes payable.		
 3) Debts forgiven by a lender. 4) Accruals of salary due to an individual directly or indirect owning an interest in the company where the accrual period exceeds 90 days. Scope: Review the general ledger for a minimum of two months during the fiscal year. 		
Regulation 12.070 Redemption and Disposal of Discontinued Chips and Tokens 18. Determine compliance with Regulation 12.070 for any chips or tokens which were discontinued during the previous fiscal year.		

✓ - Step completed without exception

EFFECTIVE: January 1, 2018 Page 12 of 15

Auditor's Name and Date

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Licensee:		Review Period:
Procedures	Step completed without exception	Exception/Comment
NRS 368A & NAC 368A Live Entertainment Tax 19. Determine whether any areas of the gaming establishment are subject to Live Entertainment Tax in which admission charges have not been reported as entertainment taxable by completing the "Entertainment Area Evaluation Form" included in the Entertainment Internal Audit Compliance Checklists. Note: This procedure is not applicable if completed when performing the Entertainment Internal Audit Checklists.		
Regulation 14.030 Approval of gaming devices and the operation of new intercasino linked systems; applications and procedures. Regulation 14.110 Approval to modify gaming devices or inter-casino linked systems; applications and procedures. 20. Determine that proper approval has been received pursuant to Regulation 14.030 to operate an inter-casino linked system or received prior approval for system		

✓ - Step completed without exception

modifications pursuant to Regulation

14.110.

EFFECTIVE: January 1, 2018 Page 13 of 15

Auditor's Name and Date	

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Review Period:

Procedures	Step completed without exception	Exception/Comment
License Conditions		
21. Determine compliance with any and all license conditions and commission orders.		
Note 1: License conditions are included on form NGC-9 emailed to each casino annually by the Tax and License Division.		
Note 2: These commission orders may be obtained from the Corporate Securities Section of the Investigations Division in Carson City, which are typically related only to publicly traded corporations.		
Compliance Committee		
22. If the licensee is required to maintain a compliance committee:		
a) Determine that the plan has been approved by the Gaming Control Board.		
b) Determine that the committee members have all been approved by the Gaming Control Board.		
c) Determine that procedures are in effect to fulfill the requirements of the plan.		
d) Determine that the aforementioned procedures are being complied with.		
Internet		
23. Review the company's website for regulatory and statutory noncompliance. Regulations 5.011 and 22 and NRS 465.091 to .094		

✓ - Step completed without exception

Licensee:

EFFECTIVE: January 1, 2018 Page 14 of 15

Auditor's Name and Date	

Internal Audit Compliance Checklist

MISCELLANEOUS REGULATIONS TESTING PROCEDURES

Review Period:

Procedures Regulation 5.050 Information to be	Step completed without exception	Exception/Comment
furnished by licensees		
24. Through review and examination of applicable documentation and inquiries of personnel, determine that a quarterly report was submitted to the Board detailing the full name and address of every person, including lending agencies, who has any right to share in the profits of such licensed games (including slot machines), whether as an owner, assignee, landlord or otherwise, or to whom any interest or share in the profits of any licensed game has been pledged or hypothecated as a security for a debt or deposited as security for the performance of any act to secure the performance of a contract sale. Regulation 5.050		
Procedures Modified or Added:		

✓ - Step completed without exception

Licensee:

EFFECTIVE: January 1, 2018 Page 15 of 15